

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

FLAGSTAR BANK, FSB,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:21-cv-568-DJN
)	
KEITER, STEPHENS,)	
HURST, GARY & SHREAVES,)	
A PROFESSIONAL CORPORATION)	
d/b/a KEITER CPA,)	
)	
Defendant.)	

MOTION TO DISMISS

Defendant Keiter, Stephens, Hurst, Gary & Shreaves, A Professional Corporation d/b/a Keiter CPA (“Keiter”), by counsel, hereby moves to dismiss the Complaint, in its entirety and with prejudice, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and for its grounds for this relief, Keiter relies on the memorandum filed this day in support, including the exhibits filed therewith.

**KEITER, STEPHENS, HURST, GARY
& SHREAVES, P.C. d/b/a KEITER CPA**

By: /s/ James W. Walker
James W. Walker, Esq. (495552)
Emma C. Greger, Esq. (94770)
O’HAGAN MEYER, PLLC
411 E. Franklin Street, Suite 500
Richmond, Virginia 23219
(804) 403-7100 – Telephone
(804) 403-7110 – Facsimile
jwalker@ohaganmeyer.com
egreger@ohaganmeyer.com
Counsel for the Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of November, 2021, I served a copy of the foregoing motion on all counsel of record via the Court's electronic filing system, via electronic mail, and via U.S. Mail, postage prepaid.

/s/ James W. Walker

Counsel for the Defendant